

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE**

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SNMP RESEARCH, INC. and SNMP RESEARCH INTERNATIONAL, INC., : Case No. 3:20-cv-00451-CEA-DCP
Plaintiffs, : U.S. District Judge Charles E. Atchley
v. :
BROADCOM INC.; BROCADE COMMUNICATIONS SYSTEMS LLC; and EXTREME NETWORKS, INC., :
Defendants. :
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**JOINT MOTION FOR LEAVE
TO FILE DOCUMENTS UNDER SEAL**

Plaintiffs SNMP Research, Inc. and SNMP Research International, Inc. (“Plaintiffs”) and Defendant Extreme Networks, Inc. (“Extreme,” collectively, “the parties”), by and through their counsel, pursuant to Federal Rule of Procedure 5.2, Local Rule 26.2, and this Court’s Memorandum and Order Regarding Sealing Confidential Information (ECF No. 11) (“Sealing Order”), jointly seek leave of this Court to submit Extreme’s Reply Memorandum of Law in Support of its Motion to Dismiss the Amended Complaint (the “Reply Memorandum”) in redacted form as set forth herein.

The parties¹ move jointly for leave to file a redacted version of the Reply Memorandum because pages i, 1, 2, 16-20, and 22 of the Reply Memorandum contain financial and pricing information that Plaintiffs have maintained is commercially sensitive and should remain

¹ Extreme does not have an independent reason to request that the Reply Memorandum be sealed, but joins in the instant request insofar as Plaintiffs have maintained that the Reply Memorandum contains commercially sensitive information.

confidential, including pricing terms and conditions negotiated between Plaintiffs and Plaintiffs' customers.

The parties continue to be mindful of the Court's instruction to be "very selective in the information they seek to seal." (ECF No. 81 at 3.) Here, Plaintiffs have sought to seal the same and similar agreements and related information in the past (*see* ECF Nos. 2, 3, 50, 51-3, 223, 224-2, 245, 276), and the Court has previously granted those motions. (*See* ECF Nos. 89, 227, 247, 279.)

Pursuant to Local Rule 26.2 and the Court's Sealing Order, the parties are publicly filing a redacted version of the Reply Memorandum as Exhibit A to this Motion. Additionally, as required by the Sealing Order, an unredacted version of the Reply Memorandum is being filed under seal, with the portions of the Reply Memorandum proposed to be redacted highlighted.

WHEREFORE, the parties respectfully request that the Court grant this Motion and seal the redacted portions of the Reply Memorandum.

DATED: April 13, 2023
New York, New York

Respectfully Submitted,

/s/ John L. Wood

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